

SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

THE WASHINGTON HARBOUR
3000 K STREET, NW, SUITE 300
WASHINGTON, DC 20007-5116
TELEPHONE (202) 424-7500
FAX (202) 424-7645
WWW.SWIDLAW.COM

NEW YORK OFFICE
THE CHRYSLER BUILDING
405 LEXINGTON AVENUE
NEW YORK, NY 10174
(212) 973-0111 FAX (212) 891-9598

RECEIVED

SEP 4 2001

September 4, 2001

VIA HAND DELIVERY

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Maglie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

**Re: CenturyTel, Inc.
Motion to Withdraw Petition for Waiver of 711 Implementation Rules
CC Docket No. 92-105**

Dear Ms. Salas:

On behalf of CenturyTel, Inc. ("CenturyTel"), transmitted herewith are an original and four (4) copies of CenturyTel's Motion to Withdraw its Petition filed in the above-referenced docket for Waiver of the Commission's 711 Implementation Rules. Please date-stamp the extra copy of this filing and return it to us in the enclosed envelope.

Should you have any questions with respect to this matter, please do not hesitate to contact the undersigned at (202) 424-7798.

Respectfully submitted,



Nancy K. Spooner
Tony S. Lee

Counsel for CenturyTel, Inc.

cc: Service List
Diane Harmon
Gregory Hlibok
Tania Cho
Jerome Stanshine
John Jones

No. of Originals rec'd 0+4
11/10/01

RECEIVED

SEP 4 2001

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

The Use of N11 Codes and Other Abbreviated
Dialing Arrangements

)
)
)
)
)
)

CC Docket No. 92-105

MOTION TO WITHDRAW PETITION FOR WAIVER

On June 5, 2001, CenturyTel, Inc. ("CenturyTel"), filed a Petition requesting a limited waiver of the Commission's 711 implementation requirements. Specifically, CenturyTel requested a waiver of Section 64.603 of the Commission's Rules, 47 C.F.R. § 64.603, until the fourth quarter of 2002, for a small, discrete portion of its network recently acquired from GTE that could not be upgraded to handle 711 calls by the FCC's October 1, 2001 deadline. Due to changed circumstances during the pendency of the Petition before the FCC, a waiver of Section 64.603 is no longer required. Accordingly, CenturyTel respectfully moves the Commission for leave to withdraw its Petition without prejudice. In support hereof, CenturyTel states as follows:

As further detailed in its Petition, CenturyTel had identified five host switches and ten remote switching modules located in Wisconsin (collectively referred to herein as "Vidar switches") that were incapable of handling 711 calls. A waiver was sought because the complexity of upgrading its many switches and other network elements to handle 711 calls, the availability of a limited pool of qualified employees and contractors, and the necessity of working within budgetary constraints required CenturyTel to develop a plan to carry out its switch-upgrade project over a two-year period. At the time CenturyTel filed its Petition,

CenturyTel had developed a "work-around" to allow the vast majority of its subscribers to access TRS services through 711 calls by the Commission's compliance deadline. A similar solution, however, was not available for the Vidar switches because Vidar equipment is no longer manufactured, and the lone vendor servicing those switches, American Digital Switching, is now out of business.

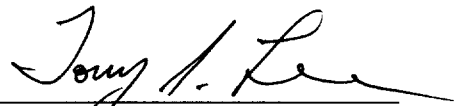
Since the filing of its Petition, CenturyTel has explored different avenues to determine whether any alternatives exist that would allow the areas served by the Vidar switches to complete 711 calls. One possible course of action identified was to have a switch "translator" (*i.e.*, a person who is skilled at manipulating the translation matrix within a switch, and is roughly equivalent to a database manager or programmer) modify the Vidar switch. CenturyTel determined that although its translator personnel were conversant in the operation of AGCS, Lucent, Nortel, and Siemens brand switches (these switches comprise the bulk of CenturyTel's network), they did not have the requisite expertise to modify the Vidar switches to accommodate 711 calls.

Approximately two months after filing its waiver request, and after meeting with Commission staff two weeks ago, CenturyTel became aware of an employee from another telecommunications company who was familiar with the operation of Vidar switches. CenturyTel quickly contacted this person and enlisted his assistance to modify the Vidar switches. The modifications required that the call-translation matrices within the switches be rebuilt to handle 711 calls, and the engineering consultant was able to incorporate these changes into all of CenturyTel's Vidar equipment. CenturyTel also has completed preliminary testing of its Vidar switches, and has determined that they can now properly process 711 calls until such time as the Vidar switches are replaced as part of the overall switch-upgrade project described in

the subject Petition. It is important to note that the person who performed the modifications to the Vidar switches is not an employee of CenturyTel, and the company cannot guarantee that it will be able to continue to retain his services. Due to the age of the Vidar switches, it is very unlikely that CenturyTel would be able to identify other comparably qualified personnel should a problem occur in the future that affects CenturyTel's ability to maintain 711 services using the Vidar switches.¹

WHEREFORE, for the foregoing reasons, CenturyTel respectfully moves the FCC for leave to withdraw its Petition for Waiver of the Commission's 711 rules. Although CenturyTel does not foresee any problems in providing 711 service to its subscribers via the modifications made to the Vidar switches as explained above, the company further requests that it be allowed to withdraw the Petition without prejudice should unanticipated maintenance issues occur that prevent the company from fulfilling its 711 obligations before the switches are replaced.

Respectfully submitted,



Nancy K. Spooner

Tony S. Lee

Swidler Berlin Shereff Friedman, LLP

3000 K Street, N.W.; Suite 300

Washington, D.C. 20007

(202) 424-7500 (phone)

(202) 424-7645 (fax)

Counsel for CenturyTel, Inc.

Date: September 4, 2001

¹ As CenturyTel has explained to Commission staff, these switches were acquired from GTE in September 2000 in a transaction that involved the transfer of more than 120,000 access lines. In approving the transaction, the Wisconsin Public Service Commission conditioned its grant upon CenturyTel's agreement to replace the Vidar switches. Therefore, CenturyTel intends to upgrade the Vidar switches with new equipment in any event. Such equipment, of course, will be 711 compliant, and will also contain other advanced functionalities that are not capable of being performed by the current switches.

CERTIFICATION

On behalf of CenturyTel, Inc., I hereby certify under penalty of perjury that I have read the foregoing Motion, and that the statements contained therein are true and correct to the best of my knowledge or belief, and are made in good faith.

John F. Jones
JOHN F. JONES
Vice President Federal Government Relations
CenturyTel, Inc.

8/31/01
Date

CERTIFICATE OF SERVICE

I, Tony S. Lee, an attorney with the law firm Swidler Berlin Shereff Friedman, LLP, hereby certify that on this 4th day of September 2001, a true and correct copy of the foregoing Motion was served via hand delivery on the following:

Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Pam Gregory, Chief
Disabilities Rights Office
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Karen Strauss
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

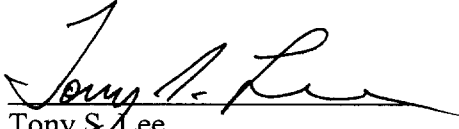
Dana Jackson
Paralegal – Consumer Information Bureau
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Pam Slipakoff
Attorney/Advisor
Network Services Division
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Susan Magnotti
Attorney/Advisor
Network Services Division
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Sean White
Attorney – Consumer Information Bureau
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

ITS
Ground Floor
445 12th Street, SW
Washington, D.C. 20554


Tony S. Lee